

**IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE EASTERN DISTRICT OF PENNSYLVANIA**

---

In Re: Franklin A. Bennett III

Chapter 13

Case No. Case No. 16-14281

---

**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE WITH  
CERTIFICATE OF SERVICE**

Franklin A. Bennett III has filed a DEBTORS MOTION TO AMEND PROOF OF CLAIM #10 AND OR ALLOW PROOF OF CLAIM PAST DEADLINE CLAIM 13 with the Court.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with an attorney.)

1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the DEBTORS MOTION TO AMEND PROOF OF CLAIM #10 AND OR ALLOW PROOF OF CLAIM PAST DEADLINE CLAIM 13, then on or before **3/6/17** you or your attorney must:

File an answer explaining your position at:

Clerk of the Court  
United States Bankruptcy Court  
Eastern District of Pennsylvania  
900 Market Street  
Philadelphia, PA 19107

If you mail your answer to the Court for filing, you must mail it early enough so the Court will **receive** it on or before the date stated above.

You must also mail a copy to:

Franklin A. Bennett III (201739)  
Attorney for Debtors  
BENNETT & ASSOCIATES, LLC  
4712 Castor Avenue

Philadelphia, PA 19124  
215-744-5550 (o)

2. If you or your attorney do not take these steps and attend the hearing, the Court may enter an order granting that relief requested in the motion.

**3. A hearing on the motion is scheduled to be held before the Chief Judge Eric L. Frank on March 13, 2018 at 1:00pm in Courtroom 1, United States Bankruptcy Court, Eastern District of Pennsylvania, 900 Market Street, Philadelphia, PA 19107.** Unless the court orders otherwise, the hearing on this contested matter will be an evidentiary hearing at which witnesses may testify with respect to disputed material factual issues in the manner directed by Fed. R. Bankr. P. 9014(d).

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1. You may contact the Bankruptcy Clerk's office at 215-408-2800 to find out whether the hearing has been canceled because no one filed an answer.

Date: 2/6/18

/s/ Franklin A. Bennett III.  
Franklin A. Bennett III (201739)  
Attorney for Debtor  
BENNETT & ASSOCIATES, LLC  
4700-12 Castor Avenue  
Philadelphia, PA 19124  
215-744-5550 (o)

**PROOF OF SERVICE**

I hereby certify that a true and correct copy of the attached and supporting documents were served by Electronic Medium as applicable and provide for by local court rule on all the parties of interest on the date listed below:

Further, I served **Citibank, N.A., as trustee for the Wachovia Loan Trust, 2005-SD1 Asset-Backed Certificates, Series 2005-SD1 via regular mail care of (c/o) the following:**

c/o WELLS FARGO BANK N A  
3476 STATEVIEW BOULEVARD  
FORT MILL, SC 29715

c/o Robert P. Wendt, Esq.  
Phelan Hallinan, Diamond & Jones, LLP  
Omni William Penn Office Tower  
555 Grant Street, Suite 300  
Pittsburgh, PA 15219  
robert.wendt@phelanhallinan.com  
T: 412-745-0600 Ext. 37382  
F: 412-745-0601

c/o Jerome B. Blank, Esquire  
Senior Bankruptcy Associate  
Phelan Hallinan Diamond & Jones, LLP  
One Penn Center at Suburban Station  
1617 JFK Blvd, Suite 1400  
Philadelphia, PA 19103  
(215) 563-7000 Ext 31625  
(215) 568-7616 (fax)  
jerome.blank@phelanhallinan.com

c/o Milstead & Associates, LLC  
220 Lake Drive East, Ste 301  
Cherry Hill, NJ 08002

Dated: 2/6/18

BY: /s Franklin A. Bennett III  
Franklin A. Bennett III, Esquire (201739)  
Attorney for the Debtor  
BENNETT & ASSOCIATES, LLC  
4700-12 Castor Avenue  
Philadelphia, Pennsylvania 19124  
(215) 744-5550 (o)